



Oregon

Theodore R. Kulongoski, Governor

Celebrating 75 years!
 Department of Agriculture
 635 Capitol Street NE
 Salem, OR 97301-2532



December 8, 2006

Ms. Lois Hamilton
 638 Park Road
 Winlock, Washington 98596

Dear Ms. Hamilton,

This letter is a follow up to the report of laboratory analysis provided to the Department in October 2006. A soil sample had been collected by you and your husband on July 21, 2006. This soil sample had been submitted to Valley Environmental Laboratory, Yakima Washington for analysis of pesticide residues. Valley Environmental Laboratory analyzed the soil sample utilizing EPA Test Method # 8151. The laboratory analysis confirmed the presence of 2,4-D at the level of 0.11 mg/Kg. A note on the laboratory analysis form stated "Abnormally high levels of 2,4-D found in this soil sample. Indicates recent treatment with 2,4-D".

On October 13, 2006, I contacted Valley Environmental Laboratory and talked with Lab Manager Cresana Puffer regarding the Hamilton soil sample. Puffer indicated that she had added the statement "Abnormally high levels of 2,4-D found in this soil sample. Indicates recent treatment with 2,4-D" to the laboratory analytical results form based on conversation with a Washington State University individual. Puffer did not recall the persons name but would try to follow up and identify her contact. Puffer also stated that she would also discuss this statement with the laboratory owner.

The Oregon Department of Agriculture, Pesticides Division, requested Dr. Fred Berman, Director of the Center for Research on Occupational and Environmental Toxicology (CROET), Oregon Health Sciences University, review the level of pesticide residue detected in the soil sample and determine if this level is of concern relative to human health or the environment. Dr. Berman's review indicated that 2,4-D residues rarely exceed 1 mg/kg in agricultural soil, except where there has been a spill or when the herbicide was used in quantities that far exceed the rates applied in normal forest or agricultural practice. If the soil were food, this level is within the allowable tolerances established for most agricultural products and therefore would be recognized as acceptable for consumption. Put another way, a 70 kg person would have to eat 1.9 kg of this soil daily in order to meet the EPA oral reference dose (RfD) of .003 mg/kg/day. The RfD is an estimate of a daily (2,4-D) exposure to the human population (including sensitive groups) that is likely to be without an appreciable risk of deleterious effects during a lifetime.

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While the Department is unable to clearly substantiate the specific source of the 2,4-D residue in your soil sample, I hope that this information will help alleviate any health or environmental concerns associated with the level of 2,4-D residue found in the soil sample. No further action is anticipated regarding this matter.

If you have any questions regarding the Department's review of your concerns, please feel free to contact me, at (503) 986-4635.

Sincerely,



Dale L. Mitchell
Assistant Administrator
Pesticides Division
503/986-4635
FAX: 503/986-4735

Cc: Scott Downey, EPA Region 10, Seattle
Edward Elms, P&E Distribution

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